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18 **UNITED STATES BANKRUPTCY COURT**  
19 **EASTERN DISTRICT OF WASHINGTON**

20 **In re:**

21 **THE CATHOLIC BISHOP OF**  
22 **SPOKANE a/k/a THE CATHOLIC**  
23 **DIOCESE OF SPOKANE**

24 **Debtor.**

25 **COMMITTEE OF TORT LITIGANTS,**

26 **Plaintiff,**

27 **v.**

28 **THE CATHOLIC BISHOP OF**  
**SPOKANE, et al.,**

**Defendants.**

Case No.: 04-08822-PCW11

Chapter 11

Adv. Case No. 05-80038

**DECLARATION OF TIMOTHY  
D. KOSNOFF IN SUPPORT OF  
COMMITTEE OF TORT  
LITIGANTS' MEMORANDUM  
OF AUTHORITIES IN  
RESPONSE TO OPPOSITIONS  
AND CROSS MOTION FOR  
SUMMARY JUDGMENT  
(DOCKET NOS. 200 and 203;  
EXEMPLAR OF PARISH  
OPPOSITION AT DOCKET NO.  
128)**

1 I, Timothy D. Kosnoff, hereby declare and state as follows:

2  
3 1. I am over the age of eighteen and competent to testify to the statements  
4 contained herein. I make this declaration based on my personal knowledge.

5  
6 2. I am an attorney licensed to practice law in the State of Washington. I  
7 am co-counsel for 95% of the state court lawsuits (the "State Court Actions") filed  
8 against the Catholic Bishop of Spokane also known as the Catholic Diocese of  
9 Spokane (the "Debtor").

10 3. In the State Court Actions, the Debtor took the deposition of numerous  
11 individuals. Attached hereto are excerpts from five of those depositions.

12  
13 4. In the hundreds of pages of declarations and pleading that the Debtor and  
14 the parishes filed in response to the Tort Litigant Committee's Motion for Partial  
15 Summary Judgment, there was no mention of a single survivor of sexual abuse by  
16 clergy. The Debtor and the parishes are doing everything possible to deny justice and  
17 healing to the survivors of sexual abuse by clergy and to muddy the issues with Canon  
18 Law.

19 5. The fact remains that the children of faithful Catholic families were  
20 sodomized, fondled, and robbed of their innocence by priests within the Diocese of  
21 Spokane. These acts occurred over the years while their parents were members of  
22 parishes within the Diocese of Spokane and were contributing money to the parishes  
23 like most other Catholic families.

24  
25 6. Attached hereto as Exhibit A are excerpts of the deposition transcript of  
26 John Doe. The deposition was taken by Greg Arpin of Paine, Hamblen, Coffin,  
27 Brooke & Miller LLP, counsel for the Debtor. My co-counsel, Duane Rasmussen,  
28 defended John Doe in the deposition. In the excerpt, John Doe testifies that when he

1 was 11 or 12 years old Father Knecht grabbed him and opened his pants. Father  
2 Knecht then instructed John Doe to get his penis out. Thereafter, Father Knecht  
3 proceeded to take a toothbrush and scrub John Doe's penis to clean it up causing  
4 bleeding and pain for weeks. For the next two years, Father Knecht would  
5 continuously instruct John Doe to remove his penis from his pants so that Father  
6 Knecht could check to see if he was clean. Father Knecht would also kiss John Doe  
7 on the lips with such force as to cause his teeth to touch John Doe's teeth. The abuse  
8 continued.

9  
10 7. John Doe also testifies that he was once approached by Father O'Malley  
11 from behind. Father O'Malley reached in front of John Doe and started fondling his  
12 genitals.

13 8. Attached hereto as Exhibit B are excerpts from the January 6, 2004  
14 deposition transcript of Cheryl E. Corrigan. The deposition was taken by Greg Arpin  
15 of Paine, Hamblen, Coffin, Brooke & Miller LLP, counsel for the Debtor. I defended  
16 Cheryl E. Corrigan in the deposition. In the excerpt, Cheryl Corrigan describes the  
17 circumstances which led to her husband's realization that he was sexually abused by  
18 Father O'Donnell. Cheryl Corrigan also describes the events of the days preceding  
19 and following the suicide of her husband, which left her as a single mother of two  
20 young children.

21 9. Attached hereto as Exhibit C are excerpts from the April 22, 2004  
22 deposition transcript of BN. The deposition was taken by Donald Stone of Paine,  
23 Hamblen, Coffin, Brooke & Miller LLP, counsel for the Debtor. I defended BN in the  
24 deposition. In the excerpts, BN describes how his abuse by Father O'Donnell started  
25 at the age of 12 and continued for approximately four years. BN describes how Father  
26 O'Donnell caused BN to masturbate him, and how Father O'Donnell masturbated and  
27 sodomized BN. BN also describes how Father O'Donnell allowed another adult to  
28

1 come to Father O'Donnell's cabin at Lake Coeur d'Alene and sexually abuse BN.

2  
3 10. Attached hereto as Exhibit D are excerpts from the May 26, 2004  
4 deposition transcript of James Doe. The deposition was taken by John G. Bergmann  
5 of Helsell Fetterman, counsel for Patrick O'Donnell. Donald Stone of Paine,  
6 Hamblen, Coffin, Brooke & Miller LLP, counsel for the Debtor, was also present. My  
7 co-counsel, Michael Pfau, defended James Doe in the deposition. In the excerpts,  
8 James Doe testifies that on a retreat he woke up to find Father O'Donnell laying  
9 almost on top of him rubbing his back and reaching into his shorts and rubbing his  
10 buttocks. After James Doe was able to resist Father O'Donnell's attempts to turn  
11 James Doe over, Father O'Donnell inserted his finger in James Doe's rectum and left  
12 him alone for the balance of the night. James Doe was in junior high at the time. On  
13 a separate occasion, Father O'Donnell led James Doe to the deep end of a swimming  
14 pool and pushed him against the wall of the pool and started masturbating James Doe.  
15 James Doe could feel Father O'Donnell's erect penis in his back. On that same day,  
16 Father O'Donnell again approached James Doe, this time in the shower, and had  
17 James Doe touch his erect penis.

18 11. Attached hereto as Exhibit E are excerpts from the May 27, 2004  
19 deposition transcript of Joseph Doe. The deposition was taken by Donald Stone of  
20 Paine, Hamblen, Coffin, Brooke & Miller LLP, counsel for the Debtor. My co-  
21 counsel, Michael Pfau, defended Joseph Doe in the deposition. In the excerpts,  
22 Joseph Doe describes how at his first confession Father O'Donnell caused him to  
23 kneel before him and say a prayer. Then Father O'Donnell grabbed Joseph Doe's  
24 hand and put it underneath his robe where his penis was exposed and used Joseph  
25 Doe's hand to masturbate. Joseph Doe was 12 years old at the time. On another  
26 occasion, Father O'Donnell took Joseph Doe and his family on a boating trip. Joseph  
27 Doe was asleep by himself when he felt Father O'Donnell on top of him with one  
28 hand on Joseph Doe's mouth and the other hand in Joseph Doe's shorts masturbating

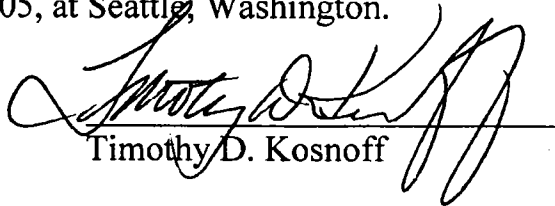
1 him aggressively. Father O'Donnell stopped in response to Joseph Doe's continuous  
2 crying.

3  
4 12. Exhibits A through E represent only a fraction of the stories of the lives  
5 that were shattered by the inhumane actions of certain priests.

6 13. The plaintiffs in the State Court Actions should not be treated as  
7 vexatious litigants who seek nothing but the downfall of the Roman Catholic Church.  
8 They should be treated as people who were robbed of their youth and deserve healing  
9 and justice for what they have suffered and will continue to suffer.

10 I declare under penalty of perjury under the laws of the United States of  
11 America that the foregoing is true and correct.

12 Executed on the 10th day of June, 2005, at Seattle, Washington.

13  
14   
15 Timothy D. Kosnoff  
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## EXHIBIT A

1 A. Yeah.

2 Q. Is there a particular clinic you go to?

3 A. Generally I go down to Riverside, the main one down  
4 here.

5 Q. Have you ever gone to any chiropractors over your life?

6 A. No.

7 Q. Have you ever attempted suicide?

8 A. No.

9 Q. Ever thought about suicide?

10 A. I've thought about it.

11 Q. Thought about doing it?

12 A. Thought about it but never did.

13 Q. Well, obviously. Have you ever taken any, undertaken  
14 any acts to end your own life?

15 A. No.

16 Q. Okay. I want to shift gears here now and go back to  
17 your time growing up in Chewelah, and I want you to tell me  
18 about the incidents that you have alluded to or referred to  
19 regarding both or either Knecht and O'Malley, and, unless  
20 your counsel has an objection, what I'd like you to do is  
21 just kind of start from the beginning and, and just tell me  
22 the story, and then I'll have some questions to follow up  
23 for you, but I kind of just want you to lay the story out  
24 for me if you can, as best you can?

25 MR. RASMUSSEN: That's fine.

1 MR. ARPIN: All right.

2 A. Well, let's see, first and foremost I have to say that I  
3 was in, I don't know if I am starting this out right or not,  
4 but I'm going to say the fact that I did have an uncle that  
5 was a priest, is that all right?

6 Q. (BY MR. ARPIN) Fine.

7 A. All right, and I was raised in a pretty believing  
8 Catholic family. I no longer practice today because of the  
9 incidents in my life.

10 When I first, now do you want O'Malley first or Knecht  
11 first?

12 Q. I want you to just start from the beginning, the first  
13 incidents that you remember of sexual abuse by anyone  
14 really, I mean either Knecht or O'Malley or anyone else if  
15 there was someone else?

16 A. No, I never had anything except for the priest. Father  
17 Knecht was the first one I had and I was, I remember I was  
18 5th or 6th grade and I was playing with myself, in fact I  
19 was masturbating in the classroom, you know, we had the  
20 covered big desks.

21 I remember a girl by the name of [REDACTED] was  
22 across from me. I know [REDACTED] is the one that went and told  
23 the sister, and then I was probably 11, 12, and I know I  
24 was helping out, filling the coal in the furnace. That was  
25 great because I would get out and go downstairs and do that,



[REDACTED] [REDACTED]  
1 but anyway at that time, and [REDACTED] went and told sister.

2 Instead of sending me to the cloak room like she  
3 normally did she stood me in the hallway. I think, if I  
4 remember right, she sent kids over to Father and Father  
5 showed up, Father Knecht, he showed up and he says, "You are  
6 going over to the house," and I thought I was going to get  
7 swats because I had gotten swats before from him with a  
8 paddle.

9 Q. Doing other things?

10 A. Yes, I was an ornery little shit. I mean I wasn't mean  
11 mean but I would get in little troubles like spit wads,  
12 mostly trying to keep quiet. I was always yakking, sister  
13 would tell me to keep quiet or something, then I would get  
14 held in or something like that.

15 So then I was there and Father got me and grabbed me by  
16 the shoulder and took me over across to his place.

17 Q. To the rectory?

18 A. To the rectory, and he stopped downstairs and he says,  
19 "You go up there and go to my room," and he says, I don't  
20 remember if something was at the door or something. I  
21 remember him talking, there was nobody else there. He says,  
22 "You go to my room," and I went up the stairs and then he  
23 got up there.

24 He, I tighten up a little bit but anyway, I was up there  
25 and he grabbed me and I, God, I can't remember if it was

[REDACTED]

1 right or left side but I remember he had one hand on me, and  
2 I was, he went around my waist, he had me like this, and he  
3 opened up my pants. I remember he was telling me, take that  
4 thing out of there, or something like that. I can't  
5 remember the exact words, but anyway I had my penis laying  
6 on the sink, and he had one, he had his arm around my waist  
7 so I couldn't get away and he was scrubbing it with a  
8 toothbrush, and I was hollering like hell, and he wouldn't  
9 stop, and he just kept doing it for a while. And then he,  
10 just all of a sudden he just said something. I can't even  
11 remember it was. He slams the door and he goes on. I'm  
12 standing there bawling. I don't know else to do.

13 Q. Okay.

14 A. Well, then he came back and opened the door, told me to  
15 clean up. Then he cleaned me up, and then I went back to  
16 class.

17 I come on back down the stairs, I remember that, and  
18 then he told me, you go on back to class. I just got back  
19 and it was time to go home, and I know it was bleeding at  
20 the time. I had to put a paper towel around it.

21 Q. Your penis was bleeding?

22 A. Oh, yeah.

23 Q. From him what, scrubbing it?

24 A. Scrubbing it with a toothbrush.

25 Q. So he had you take your penis out or did he take it out?

[REDACTED]

1 A. That I can't remember. I, I remember it when he started  
2 with that brush, I remember it hurt, I remember I hollered  
3 like hell. I remember he had an arm around me. I wasn't  
4 very big then. I was a big boy but I wasn't real big, and  
5 he scrubbed it out on me, and then I remember that I  
6 couldn't go home, tell my dad, I couldn't tell anybody. I  
7 didn't tell anybody until Eastern.

8 Q. Until Eastern?

9 A. I mean Western, excuse me, I said Eastern, Western.

10 In all them years I mean I lived with that, and I know  
11 that, I know there was times that I should have told like,  
12 you know, like my uncle come up, and I should have told him.  
13 I should have told dad but I couldn't tell him. All them  
14 years I couldn't tell people about it.

15 Q. Why did you think you couldn't tell someone?

16 A. Well, he kept telling me I was dirty.

17 Q. Is that what he was saying when he was scrubbing you?

18 A. Uh-huh, then he would ask me, and then there was times  
19 that I went out, I told him about it, that we would take a  
20 ride in a car or something. He would check me out to see if  
21 I was clean or dirty down there, but he never really  
22 masturbated me, he just pulled back that foreskin, let me  
23 see that.

24 And then there was times he would, sometimes he would  
25 give me a kiss, or a slurpy kiss I called them, and hug and

1 give me a slurpy kiss.

2 Q. We are still talking about Knecht here?

3 A. Yeah. And that went on for about, off and on I can't  
4 say how many times. I can't remember how many times but I  
5 know it was occasionally this all went on, and then he went  
6 on that, and he would always tell me I was dirty, and there  
7 was times he would ask me in the confession whether I was  
8 clean or dirty. There was no way of touching me in the  
9 confessional but he was asking me, are you keeping yourself  
10 clean. I knew what he meant.

11 And there was times that even though I worked for him,  
12 even though, I mean it just, I knew what he meant, you know  
13 what I'm saying, in the confessional I would say, yes,  
14 Father, or something like that. But I was, I was always  
15 scared he was going to do it again, let's put it that way,  
16 and I couldn't tell people about it.

17 He, in the back of the church in the vestibule he would  
18 kiss me back there a few times. It was sort of an odd  
19 thing, when I think back on it.

20 This went on until I stole wine from him, then it quit.

21 Q. After you stole wine from him?

22 A. Yeah, during church.

23 Q. So the first time this occurred was when you were in the  
24 5th or 6th grade?

25 A. Yeah.

[REDACTED]

1 Q. And this girl saw you masturbating in the class?

2 A. In the classroom, right, underneath the desk I was

3 masturbating.

4 Q. Did you have your penis --

5 A. Yes.

6 Q. -- out or were you, are you rubbing yourself?

7 A. No, I had my penis out.

8 Q. Had you done that before in class, before that time?

9 A. Not that I can remember. I might have done it with them

10 playing myself in my pants or something but I don't remember

11 having it out. But I remember that time there that I think

12 it was her and [REDACTED] (phonetic).

13 Q. So then he takes you over to his house and then he has

14 you, either he lays your penis on the sink or you do it, and

15 then when he scrubs you with a toothbrush did you ejaculate,

16 or I mean was it too painful? Did you get an erection?

17 A. It was hard, it was hard but I don't remember how it got

18 hard. I can't remember that. I remember it being hard

19 because that is when he scrubbed it was when it was hard. I

20 can remember that, and I can't remember whether I ejaculated

21 or not. It was hurting and I remember I was screaming, stop

22 it, stop it, or something. I don't think I screamed very

23 much. I really don't, I can't remember really. All I can

24 remember, I can almost see it and feel it today. That's

25 where I met with him, but I mean he is dead and gone. There

[REDACTED]

1 is nothing you can do to him.

2 Q. That was the first time he did anything to you?

3 A. Yeah, and then after that he gave me sloppy kisses.

4 Q. Was that the only time he ever touched it?

5 A. Well, he touched it when I looked at the -- I mean he

6 rolled back my foreskin, and there was sometimes, I don't

7 know what made me hard or anything. Sometimes it was hard,

8 sometimes it wasn't, but he was always checking me to see if

9 I was dirty, and he was telling me I was dirty and this and

10 that, and, you know, I couldn't stop letting him do it

11 because I didn't know what he was going to do next. I think

12 that was it. I don't know.

13 Q. How many times did he, do you recall that he touched

14 you?

15 A. Oh, probably, that probably went on for about two years

16 off and on. I don't know, probably --

17 Q. So this started in, when you were in about 5th or 6th

18 grade?

19 A. And it quit when I was about the 8th grade.

20 Q. He stopped?

21 A. 7th, 8th grade, in there, and I and [REDACTED] were working

22 together as janitors and we stole some wine from the bottom

23 of, the basement of the church, and then I remember he had

24 made my dad buy him two gallons of wine, I remember that.

25 At that time he told my dad but I couldn't tell about the

[REDACTED]

1 other.

2 Q. He told your dad that you had stolen the wine?

3 A. Yeah.

4 Q. Do you have any ideas in your own mind why it stopped  
5 then at that point?

6 A. I don't know, I'm trying to relate, I'm thinking that  
7 was the only time I can relate to. In fact he asked me, my  
8 attorney here asked me and I told him, I says I can't relate  
9 except, and then I thought a bit for a while and then I come  
10 back, for some reason the wine popped into the picture. I  
11 was thinking right about that time. Whether it was the  
12 wine, or why it stopped I don't really know. It might have  
13 been too at that time he might have been, I don't know if he  
14 might have went away on a heart attack or something. I know  
15 he had a heart attack in there somewhere, or he had illness  
16 of some kind or he had some kind of trouble anyway.

17 Q. How many times were you in a car with him when he looked  
18 at your penis?

19 A. I used to ride a lot of places with him.

20 Q. Was this because of the work that you were doing there  
21 at the church?

22 A. Well, some would and some wouldn't be. I mean sometimes  
23 he was like going out to Newberry's (phonetic) cabin at the  
24 lake, he would go out there to fish or something. Maybe he  
25 was going out, taking the [REDACTED] kid home or bringing him

[REDACTED] [REDACTED]

1 home. There is some names I forgot about, [REDACTED], write  
2 that down, [REDACTED].

3 Q. [REDACTED] and [REDACTED]?

4 A. Yeah. They were kids that lived out on the back road.

5 Q. Are they still in the area?

6 A. I think [REDACTED] is. He would have been about my age.

7 Q. Do you know of any other kids from that time that Father  
8 Knecht did anything to?

9 A. No. I didn't at that time.

10 Q. Do you know now?

11 A. Now I know that I, I know now that, I understand he had  
12 others besides me, but I don't know.

13 Q. Has anybody else told you that Father Knecht did  
14 something to them?

15 A. Nobody in particular.

16 Q. Okay.

17 A. Nobody in particular.

18 Q. Do you think that he did something to [REDACTED] and [REDACTED]  
19 [REDACTED]?

20 A. No, that is just where we went for a drive, like he  
21 would go out and check with [REDACTED] and see how they  
22 were doing. They were a pretty poor family, and he would go  
23 out to see how they were doing or, you know, the priest is  
24 always welcome. No matter where he went he was always  
25 welcome.



[REDACTED] [REDACTED]

1 And we would go to some lady's place and maybe I would  
2 be in the car. He would say this and come along with me,  
3 [REDACTED] and away we would go. I was mowing lawns, I was  
4 working as a gardiner, cleaning desks. Sometimes it was a  
5 great thing to have a treat to go somewhere, you know what  
6 I'm saying, he would just sort of haul you around with him.  
7 It wasn't that daily thing of trying to do it every day, no,  
8 but here and there it would happen.

9 Q. As you think back on it, how many times do you think  
10 that he touched you?

11 A. Oh, shit, I don't know.

12 Q. I mean at least the one time in the sink and then in the  
13 car?

14 A. Probably numerous times like over two years, probably  
15 20, 30 times, I don't know, 10, 20, 30, I don't know. I  
16 can't relate -- you know what I'm saying. It wasn't  
17 something that I could say like Sunday mass was Sunday mass,  
18 it was not like that. It was here and there, and sometimes  
19 it was twice in a week and then the next time it was none.

20 Q. Tell me different places you remember this happening?

21 A. One was in his car, most of the time it was in his car,  
22 there was never nothing in the school. That's what I can  
23 never figure out being a janitor there, but there would be  
24 in the, like there's a vestibule in the back of the church,  
25 and then there was another room coming in, and then he would

[REDACTED] [REDACTED]

1 check me there, but I remember he always looked out the  
2 door, and the stairway come up like this and he would look  
3 out the door and check and then he would have -- them times  
4 I know I can remember he would have me strip back, then he  
5 would look down on it and say, no, you are clean today, and  
6 then he would give me a slurpy kiss. I think he even told  
7 me he loved me at times, but I mean it wasn't a, well, like  
8 dad and me kissed, it was a lip kiss, and dad and I had --  
9 but his was sloppy kisses, I can remember that.

10 Q. What do you mean by sloppy kisses?

11 A. He would push until his teeth hit your teeth, hit your  
12 teeth, just squeeze really tight.

13 Q. Did he do this in front of other people?

14 A. No, not that I know of, unless somebody saw it that I  
15 don't know about.

16 Q. Were you an altar server?

17 A. Oh, yeah.

18 Q. Were you a --

19 A. Choir boy, altar server.

20 Q. -- choir boy? Were there any occasions when it happened  
21 like back in the sacristy?

22 A. That is what I was talking about, the cloak room they  
23 call it.

24 Q. That is where you dress up?

25 A. Dressed up and everything else like that.

[REDACTED]

1 Q. Okay, and then you talked about the confessional, and  
2 did it ever happen in the confessional?

3 A. No, there was no way for him to get his hand through.  
4 He would ask me --

5 Q. If you were clean?

6 A. -- if I was clean in the confessional.

7 Q. Were you circumcised?

8 A. No, I was not.

9 Q. Did he ever masturbate you?

10 A. Now that is coming back to the, that time when he  
11 scrubbed me. I know I was hard but I can't remember whether  
12 I ejaculated or not, I really can't, but I think I possibly  
13 did, but, you know, knowing now at this time I mostly did  
14 but that wasn't the thing that, that was, it wasn't an  
15 enjoyable thing at that time, that is what I'm trying to  
16 say, but I mostly did because I remember it was hard and I  
17 remember that.

18 Q. Were you still hard because you had been masturbating in  
19 the classroom or did you get hard --

20 A. I got hard, I believe I was hard, I can remember that  
21 just as plain as day, I was hard and I remember him having  
22 his arm around me and he was scrubbing. I, I can't remember  
23 if it was right hand or left hand.

24 Q. What I'm trying to get out, were you still erect because  
25 you had been playing with yourself in the classroom?

[REDACTED]

1 A. Oh.

2 Q. Or it got erect after he had you take your penis out in

3 the room?

4 A. No, I know I had gotten off in the classroom.

5 Q. You did get off in the classroom?

6 A. Yeah. I knew damn well I did because that is what

7 [REDACTED] looked at. I guess it would be the same thing as a

8 guy out here, you know, showing off, you know what I'm

9 saying, but anyway I remember that part of it anyway. I

10 know I didn't have a hard on when I got over there, I know

11 that.

12 Q. What was your uncle's name?

13 A. Father [REDACTED].

14 Q. [REDACTED]?

15 A. [REDACTED].

16 Q. Was he from Spokane?

17 A. He was from Chewelah, Spokane.

18 Q. Was he a diocesan priest or Jesuit?

19 A. Jesuit, there was [REDACTED], there was

20 another Jesuit and both part of --

21 Q. Were both your uncles?

22 A. No, one was an uncle, one was a second cousin.

23 Q. Were they at [REDACTED]?

24 A. One was at [REDACTED], he is still alive I think. I don't

25 really know, sort of lost track of them after my aunt died.